

EXHIBIT 48

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DONALD J. TRUMP FOR PRESIDENT, INC., et al.	:	NO. 2:20-CV-00966
Plaintiffs,	:	
	:	
v.	:	JUDGE J. NICHOLAS RANJAN
	:	
KATHY BOOCKVAR, in her capacity as Secretary of the Commonwealth of Pennsylvania, <i>et al.</i>	:	
Defendants.	:	

**DEFENDANT ADAMS COUNTY BOARD OF ELECTIONS' SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO PLAINTIFFS' INTERROGATORIES**

Defendant Adams County Board of Elections, by and through undersigned counsel provides objections and responses to Plaintiffs' Interrogatories as follows:

INTERROGATORIES

1. Please identify all Procedures, Practices, Rules, Regulations, and/or Instructions You implemented, used, followed, and/or communicated in the June 2, 2020 Primary Election, and all Procedures, Practices, Rules, Regulations, and/or Instructions that You intend to implement, use, follow, and/or communicate in the November 3, 2020 General Election, concerning or relating to the processing, verification, acceptance, and/or rejection of applications for absentee and/or mail-in ballots, including without limitation whether You mail applications to all qualified electors within Your county and/or whether You frank or prepay the postage for any or all completed and returned applications, and if there are any differences, please identify the reasons why You are making a change in such Procedures, Practices, Rules, Regulations, and/or Instructions for the November 3, 2020 General Election.

The Adams County Board of Elections followed the procedures set forth in the Election Code with respect to processing and rejecting applications for absentee and mail-in ballots and the delivery of ballots to accepted applicants in the June 2, 2020 Primary Election. With respect to absentee applications and ballots, Adams County

Instructions identified in Your answer to the preceding Interrogatory, including without limitation any incidents, complaints, concerns, changes, modifications, or supplementation to such Procedures, Practices, Rules, Regulations, and/or Instructions.

Adams County objects to this Interrogatory as overly broad, vague, and irrelevant to the issues raised in the Amended Complaint, namely, the legality of certain procedures actually employed by the Board of Elections. Adams County also objects on the basis that the Interrogatory seeks privileged attorney/client communications, work product, defense strategy, and/or documents and things prepared in anticipation of litigation. Internal communications in any form do not have a bearing on the legality of procedures used, and exceed the limited scope of discovery imposed by order of court on July 17th, 2020.

5. Please identify all Procedures, Practices, Rules, Regulations, and/or Instructions You implemented, used, followed, and/or communicated in the June 2, 2020 Primary Election, and all Procedures, Practices, Rules, Regulations, and/or Instructions that You intend to implement, use, follow, and/or communicate in the November 3, 2020 General Election, concerning or relating to the use, type, number, location, security, monitoring, advertisement, funding, and other factors or best practices for using drop boxes, mobile ballot collection centers, polling places, or other collection/drop-off locations for the return or delivery of voted absentee and/or mail-in ballots, including without limitation documenting security and chain of custody of such delivered ballots, and if there are any differences, please identify the reasons why You are making a change in such Procedures, Practices, Rules, Regulations, and/or Instructions for the November 3, 2020 General Election.

Adams County Board of Elections used a single “drop box” outside of the Adams County Courthouse (within mere steps of the Election Office) for the collection of mail-in ballots for those of whom did not want to come inside of the building. That drop box remained secured with a lock, which could only be unlocked by the Election Director. The box remained constantly under surveillance by security cameras that were monitored on CCTV and digitally recorded by the Security Department.

For the November 3rd General Election, Adams County Board of Elections will use a single secure “drop box” inside of the lobby of the Adams County Courthouse. The metal drop box is secured by a lock, and will be constantly monitored by surveillance

cameras and security staff. Surveillance footage is automatically retained for a period of 30 days unless a hold is placed on such footage. Access to the drop box will only be available during business hours when the courthouse is in operation. When the courthouse is not open, voters will not have any access to the drop box.

6. Please identify all correspondence, memoranda, email messages, postings, or other communications, whether in writing or made orally, that (a) were made by, to, and/or between You and any other person, including without limitation: (i) any political party or body, political committee, political action committee, non-profit organization, or other body of citizens; (ii) any voter/elector in the Commonwealth of Pennsylvania; (iii) any other County Election Board; (iv) any District Election Board; (v) any of Your employees, agents, or other representatives acting on Your behalf; and/or (vi) Secretary Boockvar and/or the Elections Department; and (b) concern, relate to, describe, explain, or justify the Procedures, Practices, Rules, Regulations, and/or Instructions identified in Your answer to the preceding Interrogatory, including without limitation any incidents, complaints, concerns, changes, modifications, or supplementation to such Procedures, Practices, Rules, Regulations, and/or Instructions.

Adams County Board of Elections objects to this Interrogatory as overly broad, vague, and irrelevant to the issues raised in the Amended Complaint, namely, the legality of certain procedures actually employed by the Board of Elections. Adams County also objects on the basis that the Interrogatory seeks privileged attorney/client communications, work product, defense strategy, and/or documents and things prepared in anticipation of litigation. Internal communications in any form do not have a bearing on the legality of procedures used, and exceed the limited scope of discovery imposed by order of court on July 17th, 2020.

7. Please identify all Procedures, Practices, Rules, Regulations, and/or Instructions You implemented, used, followed, and/or communicated in the June 2, 2020 Primary Election, and all Procedures, Practices, Rules, Regulations, and/or Instructions that You intend to implement, use, follow, and/or communicate in the November 3, 2020 General Election, concerning or relating to the pre-canvassing, canvassing, counting, and/or tabulation of voted absentee and/or mail-in